

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

JACQUELINE BEEBE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

V&J NATIONAL ENTERPRISES, LLC,
V&J UNITED ENTERPRISES, LLC, V&J
EMPLOYMENT SERVICES, INC., and
V&J HOLDING COMPANIES, INC.,

Defendants.

Case No. 6:17-cv-06075-EAW-MWP

Class / Collective Action

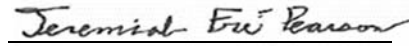
**NOTICE OF PLAINTIFF'S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that, upon the Declaration of Jeremiah Frei-Pearson, sworn on the 27th day of November, 2019, and the exhibits annexed thereto, upon all the prior pleadings and proceedings had herein, and the accompanying Memorandum of Law, Plaintiff Jacqueline Beebe, individually and on behalf of all others similarly situated, and by and through her undersigned attorneys, Finkelstein, Blankinship, Frei-Pearson & Garber, LLP ("FBFG") and with the consent of Defendants V&J National Enterprises, LLC, V&J United Enterprises, LLC, V&J Employment Services, Inc., and V&J Holding Companies, Inc., will bring a motion before this Court, on a date and time which will be provided by the Court later, respectfully moving this Court to order: the preliminary approval of class action settlement attached as Exhibit A to the Declaration of Jeremiah Frei-Pearson; the approval and issuance of the proposed notice, reminder notice, and claim form to all putative class members; Plaintiff Beebe's appointment as Class Representative; and FBFG's appointment as Class Counsel.

Dated: November 27, 2019

Respectfully submitted,

By:



Jeremiah Frei-Pearson

Andrew C. White

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*Attorneys for Plaintiff
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